

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

JOHN DOE,

Plaintiff,

v.

Case No. 19-cv-01348-PP

**BOARD OF REGENTS OF THE
UNIVERSITY OF WISCONSIN
SYSTEM, UNIVERSITY OF
WISCONSIN OSHKOSH, ANDREW
LEAVITT, SHAWNA KUETHER, and
ABIGAIL K. SYLVIA,**

Defendants.

PLAINTIFF'S MOTION TO FILE DISCLOSURE STATEMENT UNDER SEAL

John Doe, by and through his undersigned counsel, hereby moves the Court for entry of an Order authorizing him to file under seal his Disclosure Statement, and respectfully represents:

1. Attorneys for non-governmental parties or amicus curiae are required to file an appropriate disclosure statement pursuant to Civ. L. R. 7.1 (a).
2. "A party who initiates a civil action using a pseudonym instead of the plaintiff's actual name must file the disclosure statement in accordance with Civil L. R. 10(c)." Civ. L. R. 7.1 (d).
3. At the same time as the disclosure statement is filed under Civ. L. R. 7.1 (a) a party who commences a civil action using a pseudonym "must file, but not serve, a disclosure statement under seal identifying the plaintiff's actual name and providing the other information required by Civil L. R. 7.1." Civ. L. R. 10 (c).
4. With this Motion the Plaintiff does hereby file a disclosure statement that identifies his actual name and the other information required by Civ. L. R. 7.1 and in compliance with Civ. L. R. 10 (c)., with access restricted to the Court alone.

5. The same reasons stated in the pending Motion for Leave to Proceed Anonymously as John Doe apply to the need to file this Motion to File Disclosure Statement Under Seal.

6. John Doe has deep and significant concerns about disclosing his identity to the public to protect his significant privacy interests, including information of a highly sensitive and personal nature.

7. The acts complained of have the potential of carrying negative social stigma such that his identify and privacy interests are substantial.

8. John Doe acknowledges and understands that he may have the opportunity to withdraw the document before the public is given access to it, if this Motion is not granted.

WHEREFORE, after notice and a hearing, if necessary and appropriate, John Doe respectfully requests that the Court enter an Order granting this Motion and permitting John Doe to file the document(s) identified above under seal.

**DEMPSEY EDGARTON, ST. PETER,
PETAK, & ROSENFELDT LAW FIRM**
Attorneys for the **Plaintiff**

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